

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

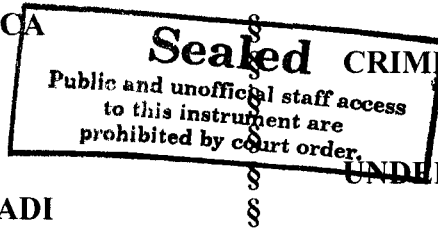
MAR 04 2015

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

MIKE SULTAN, A.K.A.
MEDHI SOLTAN MOHAMMADI



CRIMINAL NO.

UNDER SEAL

15-094

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Statements or Entries Generally - 18 U.S.C. § 1001)

On or about February 5, 2015, in the Southern District of Texas, in a matter within the jurisdiction of the United States Department of Homeland Security, a department of the United States,

**MIKE SULTAN, A.K.A.
MEDHI SOLTAN MOHAMMADI,**

the defendant herein, did then and there, knowingly and willfully make a false material statement and representation: that is, when asked by an agent of the U.S. Customs and Border Protection Officer for the Department of Homeland Security, if the defendant was transporting more than \$10,000 dollars in United States ("U.S.") currency, the defendant replied that he was carrying \$20,000 in U.S. currency, when in fact he knew he was carrying in excess of \$33,000 in U.S. currency, a material fact which the defendant knew to be false.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO

(Statements or Entries Generally - 18 U.S.C. § 1001)

On or about February 5, 2015, in the Southern District of Texas, in a matter within the

jurisdiction of the United States Department of Homeland Security, a department of the United States,

**MIKE SULTAN, A.K.A.
MEDHI SOLTAN MOHAMMADI,**

the defendant herein, did then and there, knowingly and willfully make a false material statement and representation: that is, when the defendant was asked by Homeland Security Investigations Special Agent T. Muise, if he intentionally attempted to conceal or disguise the rifle barrels inside the folded legs of the tripod in an effort to evade detection during the x-ray examination of his bags, the defendant denied doing so, a material fact which the defendant knew to be false.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By:



CAROLYN FERKO
Assistant United States Attorney